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Attorney for Plaintiff ADRIANA ORTEGA,
on behalf of herself and all others similarly situated

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Attorneys for Defendants
THE SPEARMINT RHINO COMPANIES
WORLDWIDE, INC., SPEARMINT RHINO
CONSULTING WORLDWIDE, INC., and
MIDNIGHT SUN ENTERPRISES, LLC

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

ADRIANA ORTEGA, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

vs.)

SPEARMINT RHINO COMPANIES)
WORLDWIDE, INC., SPEARMINT)
RHINO CONSULTING WORLDWIDE,)
INC., and MIDNIGHT SUN)
ENTERPRISES, LLC,)

Defendants.)

Case No. 5:17-cv-00206 JGB (KKx)

[Assigned for All Purposes to
The Honorable Jesus G. Bernal]

**JOINT NOTICE OF PROPOSED
CLASS ACTION SETTLEMENT**

Date Action Filed: February 3, 2017
Trial Date: NONE

1 Plaintiff Adriana Ortega and Opt-In Plaintiffs Roberta Friedman, Adriana
2 Avelar and Sheyenne McCrea (“Plaintiffs”), and Defendants Spearmint Rhino
3 Companies Worldwide, Inc., Spearmint Rhino Consulting Worldwide, Inc., and
4 Midnight Sun Enterprises, LLC, (“Defendants”) (Plaintiff and Defendants
5 collectively referred to as “the Parties”) attended a non-binding mediation in Boston,
6 Massachusetts on May 22, 2019 with experienced mediator D. Charles Stohler.

7 The Parties are pleased to report that as a result of this mediation, they
8 executed a term sheet and have reached a class action settlement agreement in
9 principle that would fully resolve this matter. The Parties are in the process of
10 drafting final settlement documents and preparing approval papers to submit to the
11 Court. The Parties will endeavor to submit preliminary approval documents on or
12 before June 24, 2019.

13 Though the Court had previously ordered that the Parties submit a proposed
14 protective order related to dissemination of FLSA notice, they request that this
15 deadline be stayed pending the settlement approval process.

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2 Dated: May 23, 2019

LICHTEN & LISS-RIORDAN, P.C.

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4 By: /s/ Shannon Liss-Riordan
5 Shannon Liss-Riordan
6 Attorneys for Plaintiff
ADRIANA ORTEGA

7 I attest that all other signatories listed, on
8 whose behalf the filing is submitted,
9 concur in the filing's content and have
authorized the filing.

10 Dated: May 23, 2019

FORTIS LLP

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12 By: /s/ Peter E. Garrell
13 Peter E. Garrell

14 Attorneys for Defendants The Spearmint
15 Rhino Companies Worldwide, Inc.,
16 Spearmint Rhino Consulting Worldwide, Inc.
17 and Midnight Sun Enterprises, LLC
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